

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
COLUMBUS DIVISION

PULMOREHAB, LLC, a Delaware limited
liability company,

Plaintiff,

v.

MORISSETTY MEDICAL ASSOCIATES, INC., a
Pennsylvania corporation,

Defendant.

Civil Action 2:20-cv-01167-JLG-CMV
Judge James L. Graham
Magistrate Judge Chelsey M. Vascura

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to S.D. Ohio Civ. R. 83.3(e), Plaintiff PulmoRehab, LLC hereby moves for an order permitting attorney Matthew J. Meyer to appear *pro hac vice* on its behalf and states as follows:

1. This motion is made on behalf of attorney Matthew J. Meyer of the law firm Ansa Assuncao, LLP, 100 S. Ashley Drive, Suite 1740, Tampa, Florida 33602.
2. Mr. Meyer is not a resident of the State of Ohio.
3. Mr. Meyer and the law firm of Ansa Assuncao, LLP have been retained by Plaintiff to provide legal representation in connection with the above-styled matter now pending before the above-named court.
4. Mr. Meyer is admitted to and a member in good standing of the following bars: State of Florida (Bar No. 116653); United States District Court for the Northern District of Florida; United States District Court for the Middle District of Florida; United States District Court for the Southern District of Florida; and United States Court of Appeals, Eleventh Circuit.

5. Matthew J. Meyer's Declaration is attached as **Exhibit A**. Pursuant to General Order No. 20-10, a Certificate of Good Standing from the Florida Supreme Court has been requested and will be filed upon receipt of that Certificate as required by S.D. Ohio Civ. R. 83.3(e).

5. Attorney Matthew J. Meyer is not presently appearing as counsel of record in any other case pending in the United States District Court for the Southern District of Ohio.

6. Attorney Matthew J. Meyer agrees to be familiar with, and bound by, the Local Rules of this Court and agrees to be familiar with and bound by the Code of Professional Responsibility and other professional and ethical limitations as set forth by The Ohio Bar.

7. Mr. Meyer designates James H. Gordon, Esq., Ohio Bar No. 0068454 and Jeremy R. Kopp, Esq., Ohio Bar No. 0090577, and the law firm of Ansa Assuncao, LLP, Two Miranova Place, Suite 300, Columbus, Ohio 43215, as the lawyers and law firm upon whom all notices and papers may be served and who will be responsible for the progress of the case, including the trial in default of the non-resident attorney.

8. Through their signatures affixed below, James H. Gordon, Esq. and Jeremy R. Kopp, Esq., of the law firm of Ansa Assuncao, LLP, hereby consent to such designation.

9. Matthew J. Meyer shall pay the required fee of \$200.

10. Matthew J. Meyer shall comply with email registration requirements pursuant to S.D. Ohio Civ. R. 83.3(e).

WHEREFORE, Plaintiff PulmoRehab, LLC respectfully requests this Court to enter an order admitting Matthew J. Meyer to practice before this Court, *Pro Hac Vice*.

Date: June 4, 2020

LOCAL RULE 3.01(G) CERTIFICATION

In accordance with S.D. Ohio Civ. R. 7.3(a), moving counsel conferred with opposing counsel on June 2, 2020, regarding this motion. Opposing counsel has no opposition.

/s/ Jeremy R. Kopp

James H. Gordon – Trial Attorney (0068454)

Jeremy R. Kopp (0090577)

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the above and foregoing has been furnished via email to all counsel of record, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Jeremy R. Kopp

Attorney for Plaintiff